IN THE UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

)
In re:) Chapter 11
CYPRESS ENVIRONMENTAL PARTNERS, L.P., et al., 1) Case No. 22-90039 (MI)
Debtors.) (Joint Administration Requested)
) (Emergency Hearing Requested)

AMENDED² AGENDA FOR FIRST DAY HEARING ON FIRST DAY MOTIONS SCHEDULED FOR MAY 9, 2022 AT 1:30 P.M. (PREVAILING CENTRAL TIME), BEFORE JUDGE MARVIN ISGUR AT THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS, AT COURTROOM 404, 515 RUSK STREET, HOUSTON, TEXAS 77002

- I. Evidentiary Support for First Day Pleadings.
- 1. *First Day Declaration.* Declaration of Peter C. Boylan III, Chairman & Chief Executive Officer of the Debtors, in Support of the Chapter 11 Petitions and First Day Pleadings [Docket No. 12].

<u>Status</u>: The Declaration will be relied upon as evidentiary support for the first day matters listed below.

- II. First Day Pleadings.
- 2. **Joint Administration Motion.** Debtors' Emergency Motion for Entry of an Order (I) Directing Joint Administration of Cases and (II) Granting Related Relief [Docket No. 2].

Status: This order on this motion has been entered and this matter will not be going forward.

The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, include: Cypress Environmental Partners, L.P. (1523); Cypress Municipal Water Services, LLC (5974); Cypress Environmental Partners, LLC (7385); Cypress Brown Integrity, LLC (3455); Cypress Energy Partners - 1804 SWD, LLC (9110); Cypress Energy Partners - Bakken, LLC (9092); Cypress Energy Partners - Grassy Butte SWD, LLC (9047); Cypress Energy Partners - Green River SWD, LLC (1534); Cypress Energy Partners - Manning SWD, LLC (4247); Cypress Energy Partners - Mork SWD, LLC (0761); Cypress Energy Partners - Mountrail SWD, LLC (4977); Cypress Energy Partners - Tioga SWD, LLC (3230); Cypress Energy Partners - Williams SWD, LLC (3840); Cypress Environmental - PUC, LLC (8637); Cypress Environmental Management - TIR, LLC (5803); Cypress Environmental Management, LLC (4753); Cypress Environmental Services, LLC (7770); Tulsa Inspection Resources - PUC, LLC (2514); and Tulsa Inspection Resources, LLC (4632). The Debtors' service address for the purposes of these chapter 11 cases is 5727 South Lewis Avenue, Suite 300, Tulsa, Oklahoma 74105.

² Amended items appear in **bold**.

3. Consolidated Creditor Motion. Debtors' Emergency Motion for Entry of an Order (I) Authorizing Debtors to File (A) Consolidated Creditor Matrix, (B) File a Consolidated List of 30 Largest Unsecured Creditors, and (C) Redact Certain Personal Information, (II) Waiving the Requirement to File a List of Equity Security Holders, (III) Approving Form and Manner of Notifying Creditors of Commencement of Chapter 11 Cases and Other Information, and (IV) Granting Related Relief [Docket No. 4].

Status: This matter is going forward.

4. **Schedules and Statements Motion.** Debtors' Emergency Motion for Entry of an Order (I) Extending Time to File (A) Schedules and Statements of Financial Affairs and (B) Rule 2015.3 Financial Reports and (II) Granting Related Relief [Docket No. 5].

Status: This matter is going forward.

5. *Taxes and Fees Motion.* Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Payment of Certain Taxes and Fees and (II) Granting Related Relief [Docket No. 6].

Status: This matter is going forward.

6. KCC Retention Application. Emergency Ex Parte Application for Entry of an Order Authorizing the Employment and Retention of Kurtzman Carson Consultants LLC as Claims, Noticing and Solicitation Agent [Docket No. 38].

Status: This matter is going forward.

7. *Wages Motion.* Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses and (B) Continue Employee Benefits Programs and (II) Granting Related Relief [Docket No. 8].

Status: This matter is going forward.

- 8. *Insurance and Performance Bonds Motion.* Debtors' Emergency Motion for Entry of an Order (I) Authorizing Debtors to (A) Continue Insurance Program and Performance Bond Program and (B) Pay All Obligations with Respect thereto; and (II) Granting Related Relief [Docket No. 9].
- A. Revised Insurance Order. Notice of Filing of Revised Proposed Order for Entry of an Order (I) Authorizing Debtors to (A) Continue Insurance Program and Performance Bond Program and (B) Pay All Obligations With Respect Thereto; and (II) Granting Related Relief [Docket No. 37].

Status: This matter is going forward.

9. *Utilities Motion*. Debtors' Emergency Motion for Entry of an Order (I) Determining Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utilities From Discontinuing Service, (III) Establishing Procedures for Determining Adequate Assurance of Payment, and (IV) Granting Related Relief [Docket No. 10].

Status: This matter is going forward.

10. **Cash Management Motion.** Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to (A) Continue to Operate Their Existing Cash Management System; (B) Maintain Their Existing Bank Accounts and Business Forms; (C) Pay Related Prepetition Obligations; and (D) Continue to Perform Intercompany Transactions; and (II) Granting Related Relief [Docket No. 11].

Status: This matter is going forward.

11. **DIP Financing Motion.** Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Superpriority Postpetition Financing and (B) Utilize Cash Collateral of the RBL Secured Parties, (II) Granting Adequate Protection to the RBL Secured Parties, (III) Modifying the Automatic Stay, (IV) Scheduling and Final Hearing, and (V) Granting Related Relief [Docket No. 13].

Status: This matter is going forward.

- A. **Sanjiv Declaration.** Declaration of Sanjiv Shah in Support of the Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Superpriority Postpetition Financing and (B) Utilize Cash Collateral of the RBL Secured Parties, (II) Granting Adequate Protection to the RBL Secured Parties, (III) Modifying the Automatic Stay, (IV) Scheduling and Final Hearing, and (V) Granting Related Relief [Docket No. 14].
- 12. **Solicitation Procedures Motion.** Debtors' Emergency Motion for Entry of an Order (I) Scheduling Combined Disclosure Statement Approval and Plan Confirmation Hearing, (II) Establishing the Plan and Disclosure Statement Objection Deadline and Related Procedures, (III) Approving Prepetition Solicitation Procedures, (IV) Approving the Form and Manner of Notice, (V) Directing that a Meeting of Creditors Note Be Convened and (VI) Granting Related Relief [Docket No. 17].

Status: This matter is going forward.

- A. *Plan.* Joint Prepackaged Chapter 11 Plan of Reorganization of Cypress Environmental Partners, L.P. and its Debtor Affiliates [Docket No. 15].
- B. **Disclosure Statement.** Disclosure Statement for the Joint Prepackaged Chapter 11 Plan of Reorganization for Cypress Environmental Partners, L.P. and Its Debtor Affiliates [Docket No. 16].
- C. Revised Solicitation Order. Notice of Filing of Revised Proposed Order (I) Scheduling Combined Disclosure Statement Approval and Plan Confirmation Hearing, (II) Establishing the Plan and Disclosure Statement Objection Deadline and Related Procedures, (III) Approving Prepetition Solicitation Procedures, (IV) Approving the Form and Manner of Notice, (V) Directing That a Meeting of Creditors Not be Convened, and (VI) Granting Related Relief [Docket No. 39].

Dated: May 9, 2022 Houston, Texas

/s/ James T. Grogan III

PAUL HASTINGS LLP

James T. Grogan III (TX Bar No. 24027354)

600 Travis Street, 58th Floor

Houston, Texas 77002 Telephone: (713) 860-7300 Facsimile: (713) 353-3100

Email: jamesgrogan@paulhastings.com

-and-

Justin Rawlins (pro hac vice admission pending)

1999 Avenue of the Stars, 27th Floor

Century City, California 90067 Telephone: (310) 620-5700 Facsimile: (310) 620-5899

Email: justinrawlins@paulhastings.com

-and-

Matthew Micheli (*pro hac vice* admission pending) Matthew Smart (*pro hac vice* admission pending) Michael Jones (*pro hac vice* admission pending)

71 South Wacker Drive, Suite 4500

Chicago, Illinois 60606 Telephone: (312) 499-6000 Facsimile: (312) 499-6100

Email: mattmicheli@paulhastings.com matthewsmart@paulhastings.com michaeljones@paulhastings.com

Proposed Counsel to the Debtors and Debtors in Possession

Certificate of Service

I certify that on May 9, 2022, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ James T. Grogan III
James T. Grogan III